## UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF NORTH CAROLINA RALEIGH DIVISION

IN RE:

GRATA CAFE, LLC.

CASE NO. 22-00494-5-JNC CHAPTER 11

**DEBTOR** 

# APPLICATION FOR APPROVAL OF COMPENSATION OF JEROME RADFORD

Pursuant to E.D.N.C. LBR 4002-1(d) the debtor hereby makes application for approval of compensation and employment of Jerome Radford, and in support thereof shows the Court as follows:

- 1. The above-captioned Debtor filed a voluntary petition under Title 11, Chapter 11 of the United States Bankruptcy Code on March 8, 2022. Since the filing, the Debtor has operated as a debtor-in-possession. The Debtor operates a breakfast and lunch café in Carrboro, NC.
- 2. Mr. Radford is the sole owner and manager of the Debtor. He works between forty and sixty hours per week.
- 3. Prior to the filing of this case, he was compensated in the form of owner draws, estimated to have totaled approximately \$50,000 in 2021.

WHEREFORE, the debtor respectfully requests the following:

- 1. That it be allowed to employ Jerome Radford as a W2 employee.
- 2. That compensation for Jerome Radford be approved by the Court at the rate of \$48,000 per year (gross) or \$1,846 per bi-weekly payroll.

This the 8th day of March, 2022

SASSER LAW FIRM

By: s/ Travis Sasser

Travis Sasser, State Bar No. 26707 2000 Regency Parkway, Suite 230 Cary, N.C. 27518

Tel: 919-319-7400 Fax: 919-657-7400

## VERIFICATION

I, Jerome Radford, am the Debtor's owner and manager in the above referenced case, and I hereby state, under penalty of perjury, that I have reviewed the foregoing Application, and its contents are true according to the best of my knowledge, information, and belief. I respectfully pray the Court to receive this Verified Application also as an affidavit.

Jerome Radford Grata Cafe, LLC

Sworn to and subscribed before me this 8th day of March, 2022.

NOTARY PUBLIC

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#### **NOTICE OF APPLICATION**

NOTICE IS HEREBY GIVEN that an Application has been filed by the Debtor. A copy of the Application accompanies this notice.

TAKE NOTICE FURTHER that pursuant to the Local Rules of the United States Bankruptcy Court for the Eastern District of North Carolina, you have twenty-one (21) days from the date of this Notice of Motion to file a responsive pleading to the attached Motion. You must file your response with the Clerk, United States Bankruptcy Court, Post Office Box 791, Raleigh, NC 27602 with a copy to the undersigned. Any such responsive pleading must contain a request for a hearing if, indeed, you wish to be heard by the Court. Unless a hearing is specifically requested in a responsive pleading, the attached Motion may be determined and final Orders entered by the court without a hearing.

Dated: March 8, 2022

/s/ Travis Sasser

Travis Sasser
N.C. State Bar No. 26707
Sasser Law Firm
Attorneys for Debtor
2000 Regency Parkway, Suite 230
Cary, North Carolina 27518

Tel: 919.319.7400 Fax: 919.657.7400

tsasser@carybankruptcy.com

#### **CERTIFICATE OF SERVICE**

The foregoing Application to be served on the following parties, by mailing a copy by depositing it in the United States Mail, by First Class Mail, in a properly addressed envelope with adequate postage thereon.

Bankruptcy Administrator Served electronically

ALL PARTIES ON THE ATTACHED MAILING MATRIX

Dated: March 8, 2022

/s/ Travis Sasser

Travis Sasser
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Grata Cafe, LLC 200 N. Greensboro Street Suite B12 Carrboro, NC 27510-1867

Boer Brothers Attn: Managing agent 104-R NC Hwy 54 West #333 Carrboro, NC 27510-1597

(p) CAPITAL ONE
PO BOX 30285
SALT LAKE CITY UT 84130-0285

Chubb & Son Attn: Managing Agent/Bankruptcy 600 Independence Parkway Chesapeake, VA 23320-5190

Duke Energy Attn: Managing Agent/Bankruptcy PO Box 960 Cincinnati, OH 45201-0960

Green Grass Capital Attn: Managing agent 1 Whitehall Street, Suite 200 New York, NY 10004-2109

Independent Funding Group Attn: Managing agent 1829 Coney Island Avenue Brooklyn, NY 11230-6546

Jose Juan Garcia 1100 Poplar Avenue Garner, NC 27529-3835

(p) NAVITAS CREDIT CORP ATTN JOYCE MCKULKA 201 EXECUTIVE CENTER DR SUITE 100 COLUMBIA SC 29210-8410

Pepsi Attn: Managing Agent 700 Anderson Hill Road Purchase, NY 10577-1444 Bonneville Electric Attn: Managing agent 210 B Maple Avenue Carrboro, NC 27510-2392

Carr Mill Mall Limited Partnership Attn: Managing Agent Post Office Box 673 Carrboro, NC 27510-0673

Complete Funding Group Attn: Managing agent 333 City Blvd. W. Suite 1700 Orange, CA 92868-5905

Ecolab Pest Attn: Managing Agent/Bankruptcy Post Office Box 9658 Minneapolis, MN 55440-9658

Greenberg, Grant & Richard, Inc 5858 Westheimer Road, Ste 500 Houston, TX 77057-5645

Internal Revenue Service Centralized Insolvency Operations P. O. Box 7346 Philadelphia, PA 19101-7346

Lilly's Gourmet Pasta Attn: Managing agent 1528 Tremont Street Boston, MA 02120-2928

NuCo2 Attn: Managing Agent PO Box 9011 Stuart, FL 34995-9011

Performance Food Service Attn: Managing Agent/Bankruptcy 543 12th Street Drive NW Hickory, NC 28601-4754 CFG Merchant Solutions Attn: Managing Agent/Bankruptcy 180 Maiden Lane 15th Floor New York, NY 10038-5150

Carrboro Coffee Roasters Attn: Managing agent 101 S. Greensboro Street Carrboro, NC 27510-2338

Dominion Energy Attn: Managing Agent/Bankruptcy Post Office Box 100256 Columbia, SC 29202-3256

Golden Malted Attn: Managing agent 4101 William Richardson Drive South Bend, IN 46628-9485

Haw River Wine Man Attn: Managing agent PO Box 2043 Burlington, NC 27216-2043

Intuit Payroll Services EMS Risk Management 6884 Sierra Center Parkway Reno, NV 89511-2210

NC Department of Revenue Office Serv. Div., Bankruptcy Unit Post Office Box 1168 Raleigh., NC 27602-1168

Paychex, Inc. 15501 Weston Parkway, Suite 100 Cary, NC 27513-8636

Pinnacle Credit Services Attn: Bankruptcy Department PO Box 740933 Dallas, TX 75374-0933

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ProGuard Service & Solution Atttn: Managing Agent/Bankruptcy Post Office Box 32027 New York, NY 10087-2027

Spothopper, LLC Attn: Managing agent 324 E. Wisconsin Avenue, Suite 710 Milwaukee, WI 53202-4320

The Hartford Attn: Managing Agent/Bankruptcy Post Office Box 660916 Dallas, TX 75266-0916

US Foods, Inc. Attn: Managing agent 1500 NC Highway 39 Zebulon, NC 27597 Secure Capital Solutions Attn: Managing agent 1829 Coney Island Avenue Brooklyn, NY 11230-6546

Tarheel Linen Service Attn: Managing Agent/Bankruptcy Post Office Box 15028 Durham, NC 27704-0028

(p)TIME PAYMENT CORP
16 NEW ENGLAND EXECUTIVE PARK
STE 200
BURLINGTON MA 01803-5222

Vend Lease Company, Inc. Attn: Managing Agent 8100 Sandpiper Cir, Suite 300 Baltimore, MD 21236-4992 Sparrow & Sons Plumbing & Heating Attn: Managing Agent/Bankruptcy 305 W. Weaver Street Carrboro, NC 27510-2021

Tayne Law Group 135 Pinelawn Road Suite 250M Melville, NY 11747-3122

Toast Capital Attn: Managing agent 401 Park Drive, Suite 801 Boston, MA 02215-3372